

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Telecommunications Relay Services and)	CG Docket No. 03 -123
Speech-to-Speech Services for Individuals)	
with Hearing and Speech Disabilities)	
)	
Structure and Practice of the Video Relay)	CG Docket No. 10-51
Service Program)	
)	

REPLY COMMENTS OF MEZMOCORP (DBA INNOCAPTION)

MezmoCorp (dba InnoCaption) (“InnoCaption”) submits these reply comments on the responses to the Commission’s May 14, 2018 Public Notice¹ seeking comment on the Interstate Telecommunications Relay Services (TRS) Fund administrator’s proposed provider compensation rates, funding requirement, and carrier contribution factor for the 2018-19 Fund year, for TRS compensated by the Interstate TRS Fund.²

InnoCaption agrees with the other IP-CTS providers that the data relied upon for the Rolka Loubé recommendation does not fully reflect the reasonable costs associated with providing IP-CTS services, and therefore cannot accurately reflect average provider cost and profit.³ Once the allowable reasonable costs are determined, using IP-CTS provider cost averages

¹ *Rolka Loubé Associates Submits Payment Formulas and Funding Requirement for the Interstate Telecommunications Relay Services Fund for the 2018-2019 Fund Year*, Public Notice, CG Docket Nos. 03-123, 10-51, DA 18-494 (Released May 14, 2018) (“*Public Notice*”).

² *See* Rolka Loubé Associates LLC, Interstate Telecommunications Relay Services Fund Payment Formula and Fund Size Estimate, CG Docket Nos. 03-123 and 10-51 (filed May 4, 2018) (“*2018 TRS Rate Filing*”).

³ *See* Comments of Hamilton Relay, Inc., CG Docket Nos. 03-123, 10-51 at 4 (filed May 29, 2018) (“*Hamilton Comments*”); Comments of CaptionCall, LLC, CG Docket Nos. 03-123, 10-51 at 2 (filed May 29, 2018)

to set rates is still problematic.⁴ As explained by CaptionCall, using provider cost averages to set rates “would require overlooking differences among IP-CTS providers that render their cost data non-uniform”.⁵ Lastly, InnoCaption agrees with ClearCaptions that there is currently no basis for a separate ASR rate.⁶

Respectfully Submitted,

/s/ Cristina O. Duarte
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June 8, 2018

(“*CaptionCall Comments*”); Comments of ClearCaptions LLC on Rolka Loube Associates Payment Formula and Find Size Estimate, CG Docket Nos. 03-123, 10-51 at 4 (filed May 29, 2018) (“*ClearCaptions Comments*”)

⁴ See Generally MezmoCorp (dba InnoCaption) Ex Parte Presentation., CG Docket Nos. 13-24 and 03-123 (filed May 30, 2018); *CaptionCall Comments* at 3; *ClearCaption Comments* at 4

⁵ *CaptionCall Comments* at 2-3

⁶ *ClearCaptions Comments* at 7